

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

GLOBAL EAGLE ENTERTAINMENT
INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11835 (JTD)

Joint Administration Requested

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that a certain ad hoc group of holders of the First Lien Loans² and providers of debtor in possession financing (the “Ad Hoc DIP and First Lien Lender Group”) hereby appears by their counsel, Gibson, Dunn & Crutcher LLP (“Gibson Dunn”) and Pachulski Stang Ziehl & Jones LLP (“PSZJ”). Gibson Dunn and PSZJ hereby enter their appearances pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and request that the undersigned be added to the official mailing matrix and service lists in these cases. Gibson Dunn and PSZJ request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these chapter 11 cases and copies of all papers served

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number are: Global Eagle Entertainment Inc. (7800), Airline Media Productions, Inc. (2314), Emerging Markets Communications, LLC (0735), Entertainment in Motion, Inc. (3908), Global Eagle Entertainment Operations Solutions, Inc. (3375), Global Eagle Services, LLC (7899), Global Eagle Telecom Licensing Subsidiary LLC (2547), IFE Services (USA), Inc. (2120), Inflight Productions USA Inc. (8493), Maritime Telecommunications Network, Inc. (9974), MTN Government Services, Inc. (6069), MTN International, Inc. (8559), MTN License Corp. (0314), N44HQ, LLC (0570), Post Modern Edit, Inc. (6256), Row 44, Inc.(2959), and The Lab Aero, Inc. (9831). The Debtors’ address is 6080 Center Drive, Suite 1200, Los Angeles, California 90045.

² “First Lien Loans” means loans under that certain Credit Agreement, dated as of January 6, 2017 (as heretofore amended, amended and restated, supplemented or otherwise modified), among Global Eagle Entertainment, Inc. . as borrower, the Guarantors party thereto, the lenders party thereto, and Citibank, N.A., as administrative agent.

or required to be served in these chapter 11 cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements and all other matters arising herein or in any related adversary proceeding, be given and served upon the Ad Hoc DIP and First Lien Lender Group through service upon Gibson Dunn and PSZJ at the addresses, telephone, and facsimile numbers set forth below:

GIBSON, DUNN & CRUTCHER LLP
Scott J. Greenberg
Michael J. Cohen
Jason Zachary Goldstein
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035
Email: sgreenberg@gibsondunn.com
mcohen@gibsondunn.com
jgoldstein@gibsondunn.com

PACHULSKI STANG ZIEHL & JONES LLP
Laura Davis Jones
Timothy P. Cairns
919 N. Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this *Notice of Appearance and Request for Service Pursuant to Fed. R. Bankr. P. 2002* shall not be deemed or construed to be a waiver of any of the rights of the Ad Hoc DIP and First Lien Lender Group, including, without

limitation, to (i) have final orders in non-core matters entered only after *de novo* review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Ad Hoc DIP and First Lien Lender Group may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: July 22, 2020
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com

- and -

GIBSON, DUNN & CRUTCHER LLP
Scott J. Greenberg (*pro hac vice* pending)
Michael J. Cohen (*pro hac vice* pending)
Jason Zachary Goldstein (*pro hac vice* pending)
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035
Email: sgreenberg@gibsondunn.com
mcohen@gibsondunn.com
jgoldstein@gibsondunn.com

Counsel to the Ad Hoc DIP and First Lien Lender Group